

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS

JOANNE M. ROYER,

Plaintiff,

v.

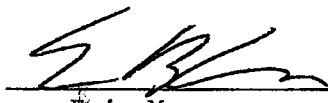
BLUE CROSS BLUE SHIELD OF  
MASSACHUSETTS, INC., BLUE CROSS  
BLUE SHIELD LONG-TERM  
DISABILITY BENEFIT PLAN, a/k/a  
OMNIBUS WELFARE BENEFITS  
PLAN, KEMPER NATIONAL  
SERVICES, INC., BROADSPIRE  
SERVICES, INC., AND SHELDON  
MYERSON, MD.,


Defendants.

CIVIL ACTION NO:  
NO: 05-CV-10448-GAO

LOCAL RULE 16.1 (D) (3) CERTIFICATION

The undersigned, as counsel for defendant Kemper National Services, Inc., and as an authorized representative of said defendant, hereby certify that we have conferred with respect to establishing a budget for the cost of conducting the full course, and various alternative courses, of the litigation and have considered resolution of the litigation through the use of alternative dispute resolution programs such as those outlined in Local Rule 16.4.

  
Eric Myers

  
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312-281-3600

CERTIFICATE OF SERVICE

I hereby certify that a true copy of the above document was served upon the attorney of record for each other party by ~~regular mail, postage prepaid~~, this 15<sup>th</sup> day of November, 2005.

**HAND DELIVERY**

E. S. Rooney Jr.  
Edward S. Rooney Jr.